

FILED

NOV 17 2020

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

UNITED STATES OF AMERICA

v.

WILLIAM LORENZ and
IVAN BERMUDEZ

20 CR 525

Violations: Title 18, United States Code,
Sections 2118(b) and (d)

JUDGE FEINERMAN

MAGISTRATE JUDGE McSHAIN

COUNT ONE

The SPECIAL NOVEMBER 2019 GRAND JURY charges:

1. On or about May 31, 2020, at Chicago, in the Northern District of Illinois, Eastern Division,

WILLIAM LORENZ and
IVAN BERMUDEZ,

defendants herein, did conspire to, without authority, enter and attempt to enter, and remain in, the business premises and property of a person registered with the Drug Enforcement Administration under section 302 of the Controlled Substances Act (21 U.S.C. § 822), namely, a pharmacy, with the intent to steal a material and compound containing a quantity of a controlled substance, and to use a facility in interstate commerce to facilitate such entry, attempted entry, and remaining in such premises and property, in violation of Title 18, United States Code, Section 2118(b).

OVERT ACTS

2. In furtherance of the conspiracy and to accomplish the objectives of the conspiracy, LORENZ and BERMUDEZ committed one or more overt acts in the Northern District of Illinois, which overt acts included but were not limited to the following:

(a) On or about May 31, 2020, LORENZ and BERMUDEZ travelled to the Walgreens pharmacy located at 1627 N. Pulaski Road, Chicago, Illinois;

(b) On or about May 31, 2020, LORENZ and BERMUDEZ travelled to the Walgreens pharmacy located at 3110 W. Armitage Avenue, Chicago, Illinois; and

(c) On or about May 31, 2020, LORENZ and BERMUDEZ travelled to the Walgreens pharmacy located at 4001 W. Irving Park Road, Chicago, Illinois,

In violation of Title 18, United States Code, Section 2118(d).

COUNT TWO

The SPECIAL NOVEMBER 2019 GRAND JURY further charges:

On or about May 31, 2020, at Chicago, in the Northern District of Illinois,
Eastern Division,

WILLIAM LORENZ and
IVAN BERMUDEZ,

defendants herein, without authority, entered and attempted to enter, and remained in, the business premises and property of a person registered with the Drug Enforcement Administration under section 302 of the Controlled Substances Act (21 U.S.C. § 822), namely, Walgreens, located at 1627 N. Pulaski Road, with the intent to steal a material and compound containing a quantity of a controlled substance, and used a facility in interstate commerce to facilitate such entry, attempted entry, and remaining in such premises and property;

In violation of Title 18, United States Code, Section 2118(b).

COUNT THREE

The SPECIAL NOVEMBER 2019 GRAND JURY further charges:

On or about May 31, 2020, at Chicago, in the Northern District of Illinois,
Eastern Division,

WILLIAM LORENZ and
IVAN BERMUDEZ,

defendants herein, without authority, entered and attempted to enter, and remained in, the business premises and property of a person registered with the Drug Enforcement Administration under section 302 of the Controlled Substances Act (21 U.S.C. § 822), namely, Walgreens, located at 3110 W. Armitage Avenue, with the intent to steal a material and compound containing a quantity of a controlled substance, and used a facility in interstate commerce to facilitate such entry, attempted entry, and remaining in such premises and property;

In violation of Title 18, United States Code, Section 2118(b).

COUNT FOUR

The SPECIAL NOVEMBER 2019 GRAND JURY further charges:

On or about May 31, 2020, at Chicago, in the Northern District of Illinois,
Eastern Division,

WILLIAM LORENZ and
IVAN BERMUDEZ,

defendants herein, without authority, entered and attempted to enter, and remained in, the business premises and property of a person registered with the Drug Enforcement Administration under section 302 of the Controlled Substances Act (21 U.S.C. § 822), namely, Walgreens, located at 4001 W. Irving Park Road, with the intent to steal a material and compound containing a quantity of a controlled substance, and used a facility in interstate commerce to facilitate such entry, attempted entry, and remaining in such premises and property;

In violation of Title 18, United States Code, Section 2118(b).

A TRUE BILL:

FOREPERSON

Signed by Erika L. Csicsila on behalf of the
UNITED STATES ATTORNEY